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Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and for the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

Adv. Pro. No. 10-04674 (SMB)

v.

WALTER J. GROSS REVOCABLE TRUST, a  
New York trust, QTIP MARITAL TRUST UNDER  
ARTICLE VIII OF THE WALTER J. GROSS  
REVOCABLE TRUST, a New York trust, LORA  
JOY APPLETON, as trustee, GENERATION  
SKIPPING TRANSFER TAX EXEMPTION  
TRUST UNDER ARTICLE FIFTH OF THE WILL

OF WALTER J. GROSS, a New York trust,  
ESTATE OF WALTER J. GROSS, BARBARA S.  
GROSS as trustee, as personal representative, as an  
individual, and as joint tenant, SUSAN J.  
ANOLICK, and ROBERT J. GROSS,

Defendants.

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL OF ADVERSARY  
PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), by and through his counsel, Baker & Hostetler LLP, and Walter Gross Revocable Trust, QTIP Marital Trust Under Article VIII of the Walter J. Gross Revocable Trust, Lora Joy Appleton, as trustee, Generation Skipping Transfer Tax Exemption Trust Under Article Fifth of the Will of Walter J. Gross, Estate of Walter J. Gross, Barbara S. Gross, as trustee, as personal representative, as an individual, and as joint tenant, Susan J. Anolick, and Robert J. Gross (collectively, “Defendants”), by and through their counsel, Moses & Singer LLP (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On December 1, 2010, the Trustee filed and served the Complaint against Defendants.
2. On June 20, 2011, Defendants served an answer on the Trustee.
3. Pursuant to Federal Rule of Civil Procedure 41(a)(1), made applicable by Federal Rule of Bankruptcy Procedure 7041, the Parties hereby stipulate to the dismissal of the adversary proceeding with prejudice.
4. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and

parties of interest.

5. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: July 14, 2015

Of Counsel:

**BAKER & HOSTLER LLP**

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*Attorneys for Defendants*

SO ORDERED

Dated: July 15th, 2015  
New York, New York

/s/ STUART M. BERNSTEIN  
HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE